

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: : Case No. 1:19-bk-01801-HWV
H & S TOWING SERVICE, INC., :
Debtor-in-Possession :
: Chapter 11

MOTION SEEKING ORDER TO CLOSE CHAPTER 11 PROCEEDING

TO THE HONORABLE HENRY W. VAN ECK, CHIEF BANKRUPTCY JUDGE:

COMES NOW H & S Towing Service, Inc., by and through its attorney Lawrence G. Frank, Esquire, and makes this motion, respectfully stating in support thereof:

1. A voluntary Chapter 11 petition was filed in the above-captioned proceeding on April 27, 2019.
2. An Order confirming the Debtor's Chapter 11 Plan was entered on December 15, 2020.
3. Several payments have been made pursuant to the confirmed Chapter 11 Plan.
4. Any past due quarterly reports and fees due to the Office of the United States Trustee will be paid as a condition to closing the case.
5. This motion is filed seeking an Order closing the case in light of the above.

WHEREFORE, the Debtor-in-Possession respectfully requests this Honorable Court to enter an Order closing the above-captioned Chapter 11 proceeding.

Respectfully Submitted,

/s/ Lawrence G. Frank

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Attorney for Debtor-in-Possession

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CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of September 2021, I electronically filed the foregoing *Motion Seeking Order to Close Chapter 11 Proceeding* with the Clerk of the Bankruptcy Court by using the CM/ECF system which sent notification of such filing to the following filing user at the email address below.

U.S. Trustee – ustpregion03.ha.ecf@usdoj.gov

LAW OFFICE OF LAWRENCE G. FRANK

/s/ Lawrence G. Frank, Esquire

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